

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CHRISTOPHER J. WALSH, as he is ADMINISTRATOR,  
CONSTRUCTION TEAMSTERS HEALTH AND  
WELFARE FUND and INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS, LOCAL 379,  
Plaintiffs

vs.

HILEE, INC.,

Defendant

and

GIOIOSO BROS., INC. and THE MCCOURT  
CONSTRUCTION COMPANY, INC.,  
Reach-and-Apply Defendants

and

FLEET BANK,

Trustee

C.A. No. 05-10010 EFH

**MOTION FOR EXTENSION OF TIME TO FILE  
FOR ENTRY OF DEFAULT JUDGMENT**

Plaintiffs Christopher J. Walsh, as he is Administrator, Construction Teamsters Health and Welfare Fund, et al, herein respectfully move this honorable Court for an extension of time until October 31, 2005 in which to file Plaintiffs' Motion for Entry of Default Judgment. As grounds therefore, Plaintiffs state as follows:

1. The parties have been attempting to resolve the above-captioned matter.
2. Judicial resources, as well as the parties' resources, will be conserved if the matter can be settled promptly and efficaciously.

WHEREFORE, Plaintiffs seek an extension of time until October 31, 2005 in which to file for Entry of Default Judgment in this matter.

Respectfully submitted,

CHRISTOPHER J. WALSH, as he is  
ADMINISTRATOR, CONSTRUCTION  
TEAMSTERS HEALTH AND WELFARE  
FUND, et al,

By their attorneys,

/s/ Gregory A. Geiman  
Anne R. Sills, Esquire  
BBO #546576  
Gregory A. Geiman  
BBO #655207  
Segal, Roitman & Coleman  
11 Beacon Street  
Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: September 8, 2005

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the above Motion of Extension of Time to File for Default Judgment has been served by first class mail upon Defendant, Hilee, Inc. at 100 Tremont Street, Everett, MA 02149 this 8<sup>th</sup> day of September, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire